

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE**

**NOEL ANTONIO SANTIAGO FELICIANO  
IOVASKA CLAUDIO VARGAS**

**CASE: 24-04233-MCF**

**DEBTOR (S)**

**CHAPTER 13**

**REPLY TO TRUSTEE'S MOTION TO DISMISS**

**TO THE HONORABLE COURT:**

**COMES NOW** debtors through their undersigned attorney and very respectfully pray and show as follows:

1. The trustee filed a Motion to Dismiss given the debtors and counsel did not attend the 341 meeting.
2. The debtors' counsel requested continuance of the 341 meeting. However, the request was made through letter and the 341 meeting was called.
3. The request for continuance was submitted to Trustee about an hour after the meeting was called apparently due to a clerical mistake.
4. The debtors are up to date with payments to the Trustee and have submitted all documents even prior to the original 341 meeting.
5. The debtors hereby request an opportunity to be able to continue with their case and apologize for the delay.

**WHEREFORE** the debtors very respectfully request from this Honorable Court to take notice of the above and deny the motion to dismiss filed on docket number 11, after allowing trustee to state his position.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this same date of filing a copy of this motion has been forwarded to every creditor in the master list address that do not have electronic filing records and for those who have the Notification has been made by means of the CM/ECF System, including the Chapter 13 Trustee and the U.S. Trustee for the District of Puerto Rico.

In Carolina, Puerto Rico this December 16, 2024.

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/s/ ROSANA MORENO RODRIGUEZ  
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0104-3  
Case 24-04233-MCF13  
District of Puerto Rico  
Old San Juan  
Mon Dec 16 07:47:02 AST 2024

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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